

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 3:23-CR-149
	:	
DAMIEN BOLAND,	:	
ALFRED ATSUS,	:	
JOSEPH ATSUS AND	:	JUDGE MANNION
NICHOLAS DOMBEK	:	
	:	
Defendants.	:	ELECTRONICALLY FILED

**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE THE
GOVERNMENT'S EXPERT TESTIMONY REGARDING THE
AUTHENTICITY, VALUE, AND/OR AGE OF THE ALLEGED OBJECTS
OF CULTURAL HERITAGE**

Defendants, Damien Boland, Alfred Atsus, and Joseph Atsus, by and through their undersigned counsel, hereby jointly move *in limine* to exclude the government's expert testimony regarding the authenticity, value, and/or age of the alleged objects of cultural heritage. In support of their Motion, the Defendants rely on their supporting memorandum of law being filed simultaneously herewith.

Respectfully submitted,

/s/Jason J. Mattioli

Jason J. Mattioli

Michael J. Ossont

Attorneys for Defendant

Alfred Atsus

/s/Matthew L. Clemente

Matthew L. Clemente

*Attorney for Defendant
Damien Boland*

/s/ Patrick A. Casey
Patrick A. Casey
*Attorney for Defendant
Joseph Atsus*

Date: July 12, 2024

CERTIFICATE OF NON-CONCURRENCE

I, Patrick A. Casey, certify that I sought the concurrence of Assistant United States Attorney James Buchanan in this Motion. Mr. Buchanan does not concur in this Motion. Counsel sought the concurrence of co-counsel, Ernie D. Preate, Esq, on July 12, 2024 and will supplement the Court with his response.

/s/ Patrick A. Casey
Patrick A. Casey

Date: July 12, 2024

CERTIFICATE OF SERVICE

I, Patrick A. Casey, hereby certify that a true and correct copy of the foregoing Joint Motion *in Limine* to Exclude the Government's Expert Testimony Regarding the Authenticity, Value, and/or Age of the Alleged Objects of Cultural Heritage was served upon the counsel of record via the Court's ECF system on this 12th day of July, 2024:

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/s/ Patrick A. Casey
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